



U.S. Department of Justice

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May 23, 2018

Honorable Catherine C. Blake
United States District Court for the District of Maryland
101 West Lombard Street Baltimore,
MD 21201

Re: United States of America v. Montana Barronette et al
Criminal No. CCB-16-597

Dear Judge Blake:

On May 4, 2018, the Court held a motion's hearing in the above captioned case. The following motions still require additional testimony, argument, or briefing:

1. Additional testimony is required for two of defendant Sivells' motions to suppress related to warrantless searches and seizures on August 11, 2015 and April 8, 2016. *See* ECF No. 256 and 269.
2. Defendant Sivells also moved to suppress evidence from a traffic stop on January 28, 2016. The government failed to address this motion in its response and will file a supplemental response motion. That motion will likely require additional testimony.
3. Defendant Sivells also moved to suppress multiple tracking warrants. *See* ECF No. 259. The government failed to address this motion in its response and will file a supplemental response motion.
4. Defendant Sivells moved to suppress any and all statements made by Sivells, without identifying any specific statement. *See* ECF No. 253. The Court heard testimony concerning a statement by Sivells on October 27, 2016. During its investigation, the government has received several homicide files from the Baltimore City Police Department, including the homicide file for the murder of BL in 2011. That file references a statement made by Sivells. The government, however, has not received the audio recording of that statement. If the government

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obtains the statement and intends to offer it, the government will include that statement in its supplemental response.

5. Finally, defendant Sivells filed motions to suppress search warrants. These motions have been briefed and only require argument. *See* ECF No. 258.

The government requests two weeks to file any supplemental response motion.

Very truly yours,

Robert K. Hur
United States Attorney
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By: _____/s/
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